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**Via ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED

SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 10/17/2023

Extension is granted until November 17, 2023.

**Re: *Rodriguez v. Edison's Restaurant et al***  
**Civil Action No. 1:22-cv-01909-VSB**

Dear Judge Broderick:

Our office represents Plaintiff in the above-captioned matter, and we submit this letter with defense counsel's consent to request a brief extension of the parties' time to file the proposed settlement agreement ("Agreement"), joint letter explaining why the settlement is fair and reasonable ("Cheeks Letter"), and our contemporaneous billing records ("Records"). We are requesting an extension from the deadline of October 17, 2023 to November 17, 2023. This is the parties' second request for an extension of this deadline.

Our office provided defense counsel with the draft Agreement on October 6, 2023, but we have yet to receive a response from defense counsel as to whether the Agreement is acceptable as written or whether Defendants request edits, despite our multiple follow-ups over e-mail and telephone. Accordingly, the Agreement has not been finalized or executed. We therefore respectfully request that the parties' time to file the Agreement, Cheeks Letter, and Records be extended until November 17, 2023. We also respectfully ask the Court to order that opposing counsel respond timely to our office's communications regarding this matter.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Eliseo Cabrera  
Eliseo Cabrera